Wholesale Electricity Market Rule Change Proposal Submission Form

<RC_2008_21> < LOCAL BLACK START PROCEDURES >

Submitted by

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Submission

1. Please provide your views on the proposal, including any objections or suggested revisions.

Synergy acknowledges System Management's obligation to make operational plans and preparations to restart the SWIS in the event of a supply shutdown, and to use its reasonable endeavours to restart the system in the event of a shutdown. Synergy welcomes System Management's increased emphasis on these matters, most specifically, their recent review of the existing arrangements for restarting the SWIS.

While Synergy is not directly involved in the implementation of Black Start procedures, we see a clear need for System Management to be fully informed of the technical requirements and limitations of generating facilities connected to the SWIS in order to fulfil their obligations. To the extent that System Management have identified a need for further information, and that this information is enshrined in this rule change proposal, then Synergy is supportive of the rule change proposal.

2. Please provide an assessment whether the change will better facilitate the achievement of the Market Objectives.

Synergy notes that this rule change only applies to Market Generators and that Synergy is therefore not directly affected.

3. Please indicate if the proposed change will have any implications for your organisation (for example changes to your IT or business systems) and any costs involved in implementing these changes.

Synergy is not directly affected by this rule change and therefore will not be subject to additional costs arising from its implementation.

4. Please indicate the time required for your organisation to implement the change, should it be accepted as proposed.

Synergy is not directly affected by this rule change and therefore will not be required to allocate any time to its implementation.